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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. CR 19-00274 JD
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER TO
)	CONTINUE STATUS CONFERENCE TO
v.)	SEPTEMBER 4, 2019 AT 10:30 A.M. AND TO
)	EXCLUDE TIME UNTIL SEPTEMBER 4, 2019
DERRICK WILLIAM WHITE,)	
)	
Defendant.)	

1 The above-entitled matter is currently scheduled for a hearing on July 31, 2019, at 10:30 a.m.,
 2 for status. The parties hereby stipulate to continue this hearing to September 4, 2019 at 10:30 a.m. to
 3 provide the parties additional time to discuss and reach a global resolution on this matter and a related
 4 Form 12. Both parties are available on the requested hearing date of September 4, 2019.

5 Both parties also require additional time for review of discovery, including discovery that the
 6 government is seeking that is currently in the state's possession. The parties stipulate that time be
 7 excluded under the Speedy Trial Act until September 4, 2019 to allow for effective preparation of
 8 counsel and review of discovery. The parties further stipulate and agree that the ends of justice served
 9 by excluding the time until September 4, 2019 from computation under the Speedy Trial Act outweigh
 10 the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

11 IT IS SO STIPULATED.

12 DATED: July 29, 2019

DAVID L. ANDERSON
 United States Attorney

13
 14 /s/
 LEAH PAISNER
 Special Assistant United States Attorney

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 16
 17 DATED: July 29, 2019

/s/
 MARK GOLDROSEN
 Attorney for Defendant
 DERRICK WILLIAM WHITE

18
 19
 20
 21 **~~PROPOSED~~ ORDER**

22 Based on the reasons provided in the stipulation of the parties above and for good cause, the
 23 Court hereby continues the status hearing in this case to September 4, 2019 at 10:30 a.m.

24 Based upon the facts set forth in the stipulation of the parties and the representations made to the
 25 Court on July 29, 2019 and for good cause shown, the Court finds that failing to exclude the time up
 26 until September 4, 2019 would unreasonably deny defense counsel and the defendant the reasonable
 27 time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §
 28

1 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time until
2 September 4, 2019 from computation under the Speedy Trial Act outweigh the best interests of the
3 public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS
4 HEREBY ORDERED that the time until September 4, 2019 shall be excluded from computation under
5 the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

6
7 IT IS SO ORDERED.

8
9 DATED: July 30, 2019



HONORABLE JAMES DONATO
United States District Judge